

REMARKS

Upon entry of the forgoing amendments, claims 1-50 are pending in this application with claims 1, 13, 17-19, 23, 27-29, 38, and 46 being independent claims. No claim is allowed.

Claim 46 has been amended to correct a grammatical error noted in the Office Action.

Objection to Claims

Claim 46 stands objected to because of a grammatical informality. With this paper, claim 46 has been amended to improve readability thereby removing the objection.

The 35 U.S.C. § 103 Rejection

Claims 1-18 and 29-45 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over *Bui et al.* (US 6,412,007 B1) in view of *Locklear, Jr. et al.* (US 6,252,878 B1) and *Kalajan et al.* (US 6,006,258). Claims 19-28 and 46-50 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over *Bui* in view of *Locklear, Wipfel et al.* (US 6,151,688), and *Kalajan*. These rejections are respectfully traversed.

Generally, the Office Action states that *Bui* discloses or suggests most of the claim elements and limitations and that *Locklear, Wipfel*, and *Kalajan* disclose or suggest the rest. However a careful review of the evidence presented reveals that it fails to support the arguments. The same or similar citations are given throughout the Office Action for each of the various rejections, so the rejections of claims 17 and 7 will be used as examples with the same or similar rebuttal arguments applying to all of the rejected claims.

In the Response to Arguments section, the Office Action states that "Applicant's arguments with respect to claim 1-50 have been considered but are moot in view of the new ground(s) of rejection." This is not entirely true. Most of the analysis and citations presented in the "new" rejections are word-for-word identical to before. Consequently, at least two of the

Applicant's arguments continue to apply equally to the current rejections. The addition of the *Kalajan* reference does nothing to refute these arguments which will be repeated below.

First with respect to claim 17, the Office Action cites *Bui* col. 23, lines 50-63 as disclosing or suggesting "responding to a new user's attempt to log in to the data communications network by checking to see if the UIV of the new user is already included in an existing entry in the master list, and if it is, clearing the existing entry from the master list and adding a new entry to the master list, the new entry containing at least the new user's UIV and group identification information" as claimed. However, at best, the citation discloses only a conventional log in request. There is no discussion of UIVs, checking of lists, clearing from lists, or adding to lists. The citation merely contains a vague reference to "determin[ing] whether...authorization may be performed". This citation fails to accurately and fully support the argument. An attempt to bolster this citation with a second citation to *Bui* col. 24, lines 10-59 is of no avail. The second cited discussion is with respect only to removing a partially authorized session from one of multiple authoritative DSCs (808, 810, and 812) as the session could not be fully established (line 49). (See also *Bui* col. 24, line 60 through col. 25, line 15.) The second citation is not a discussion of an attempt to establish a second session that requires the removal of the first fully authorized session and the addition of the second session as claimed. Further, the discussion is with respect to checking thresholds and updating session counters and has nothing to do with entries on a master list such as UIVs as claimed. The *Bui* citations given in the Office Action fail to support the argument which should be withdrawn.

Second with respect to claim 17, the Office Action cites *Locklear* col. 5, line 59 through col. 6, line 4 as disclosing or suggesting "a method to correct a count for to compensate for abnormal disconnections of users belonging to a group." However, the citation contains merely

a conclusion, that is, "[u]pon expiration of a session (...[due to] equipment malfunction) access server 16 removes the entry..." (Col. 6, lines 1-3) There are no details given as to how the equipment malfunction is identified. Further, there is no clear description in the rejection as to how the two references are to be combined. The terse nature of the citation is more akin to an objective that *Locklear* seeks to achieve. The means to achieving that objective are not disclosed and may be incompatible with the disclosure of *Bui*. Without more technical detail from *Locklear* or the Office Action, one can not be certain whether the references can even be combined. If the combination fails technically, then the rejection fails as well. The *Locklear* citation given in the Office Action fails to accurately and fully support the argument which should be withdrawn.

Third with respect to claim 17, the Office Action cites *Kalajan* col. 5, lines 31-67 as disclosing or suggesting "a method for assigning a unique identifier to each port of a network access server." However, the citation merely discloses that one can identify a particular port if one knows both the device address and the port number. Neither value individually is unique or adequate, that is, each address includes a plurality of ports and each port could be on any of a plurality of devices. It is only by taking the two values together that the particular port is identified. The intersection of the two values is unique, but the values themselves are not. As *Kalajan* notes "OS 44 automatically uses *both* the client's source address 14 and port number 12 to uniquely route messages received by server 18..." (emphasis added) (Col. 5, lines 58-60) Conversely, the present claims recite "assigning a unique identification value (UIV) to each port of a network access server (NAS) of the data communications network". The difference might best be delineated by an example to a Cartesian coordinate system. One way to identify the intersection of the X axis with the Y axis is for one to use the values of $X = 0$ and $Y = 0$ or (0,0)

for short. This requires two values. Another way is for one to use the term origin. This requires only one value. The former is akin to *Kalajan*, while the latter is akin to the claimed invention. The *Kalajan* citation fails to support the argument which should be withdrawn.

Fourth with respect to claim 7, the Office Action cites *Bui* col. 12, line 60 through col. 13, line 3 as disclosing or suggesting "forming a unique identification value." However, this is contradictory to the analysis given with respect to claim 17 where the Office Action states that "*Bui* does not explicitly teach...assigning a unique identification value to each port." These contradictory positions can not be held or resolved and thus the rejections should be withdrawn.

In view of the above, it is respectfully asserted that the claims are now in condition for allowance.

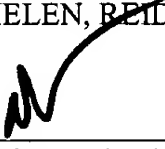
Request for Allowance

In view of the foregoing, reconsideration and an early allowance of this application are earnestly solicited.

If any matters remain which could be resolved in a telephone interview between the Examiner and the undersigned, the Examiner is invited to call the undersigned to expedite resolution of any such matters.

Respectfully submitted,
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